



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 9, 2008

Jean Paul Bradshaw, Treasurer
Graves for Congress
2345 Grand, Suite 2400
Kansas City, MO 64108

Response Due Date:
October 9, 2008

Identification Number: C00359034

Reference: 12 Day Pre-Primary Report (4/1/08 - 7/16/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 items:

1. Some of the contributions itemized on Schedule A of your report appear to have incorrect values in the "Election Cycle-to-Date" field. This field should reflect the total amount that the committee received from the contributor in the current election cycle, from 11/8/06 through the date of receipt of the contribution. (11 CFR § 104.3(a)(3)) Some of the election cycle-to-date totals reported on your Schedule A do not appear to include all contributions from the contributor received in this election cycle. Failure to correctly total contributions received from a given source in the election cycle could lead to acceptance of excessive contributions by the committee. Please note that this problem frequently occurs when the contributor name is entered in the committee's electronic reporting database more than once using a different spelling and/or format. This prevents the database from properly aggregating contributions from the same individual or entity. Entering correct election cycle dates and ensuring that the name of each contributor is entered into the database only once would help avoid election cycle-to-date errors. When reporting contributions from political action committees, using the contributor's FEC identification number will help prevent duplicate entries.

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Please review your procedures for compliance with this requirement and amend your report(s) as necessary. Incorrect aggregate election cycle to date totals for contributors listed on your report include the following:

<u>Name</u>	<u>Date</u>	<u>Amount</u>	<u>Reported</u> <u>ECTD Total</u>	<u>ECTD Total</u> <u>Calculated</u> <u>by the FEC</u>
James G Robinson	7/1/08	\$ 500.00	\$ 600.00	\$1,000.00
Embarq Employees PAC	6/18/08	\$1,000.00	\$3,000.00	\$4,000.00
HALPAC	4/21/08	\$1,000.00	\$1,000.00	\$2,000.00

If you need more information, please contact the undersigned analyst.

2. The election cycle-to-date totals for certain entries on your report indicate additional contributions that should have been itemized. When contributions from an individual reach \$200 for an election cycle, each subsequent contribution from that individual must be itemized, regardless of the amount. Additionally, each contribution from a political committee must be itemized, regardless of the amount. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a)(4)) Please amend your report to correct the discrepancies in the aggregate totals for the following entries:

<u>Name</u>	<u>Date</u>	<u>Amount</u>	<u>Reported</u> <u>ECTD Total</u>	<u>ECTD Total</u> <u>Calculated</u> <u>by the FEC</u>
Byron C Shutz	4/13/08	\$ 300.00	\$ 800.00	\$ 300.00
John F Wallace	6/14/08	\$2,300.00	\$4,700.00	\$4,000.00

If you need more information, please contact the undersigned analyst.

3. Commission regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense," "media," "salary," "polling," "travel," "party fees," "phone banks," "travel expenses," "travel expense reimbursement," and "catering costs." Examples of Election Day and voter registration activity include "exit polling," "door-to-door get out the vote," "get out the vote phone calls," and "driving voters to the polls." Unacceptable descriptions, which require additional clarification, include but are not limited to "advance," "consulting," "political consulting," "commission," "contract labor," "retainer," "election day expense," "expenses," "invoice," "support," "expense reimbursement," "miscellaneous," "professional services," "get-out-the-vote," "voter registration," "retainer". (11 CFR § 104.3(b)(4)(A))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf. Please amend Schedule B of your report to correct the descriptions that do not meet the requirements of the regulations.

4. Schedule B of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize, as a memo entry, the name and address of the original vendor, together with the date, amount and purpose of the expenditure. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1155.

Sincerely,



Vicki Hubbard

Senior Campaign Finance Analyst
Reports Analysis Division

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